

EXHIBIT D

Lisa A. Bryant

v.

Madison Management Services, LLC, et al.

Transcript of
Nancy Garnett
Volume I
July 30, 2021



(702) 476-4500 | www.oasisreporting.com | info@oasisreporting.com
400 South Seventh Street, Suite 400, Las Vegas, NV 89101

COURT REPORTING | NATIONAL SCHEDULING | VIDEOCONFERENCING | VIDEOGRAPHY

Nancy Garnett

Lisa A. Bryant v. Madison Management Services, LLC, et al.

Page 1

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

LISA A. BRYANT,

Plaintiff,

vs.

MADISON MANAGEMENT SERVICES, LLC,
and WALDMAN & PORRAS, PLLC,

Defendants.

)
)
)
)
) Case No.:
) 2:20-cv-00594-JAD-EJY
)
)
)
)
)

VIDEOTAPED, VIDEOCONFERENCED DEPOSITION OF NANCY GARNETT

On Friday, July 30, 2021
At 1:36 p.m.

Reported by: Sarah M. Winn-Boddie, RPR, CCR No. 868
Job No. 45705

Nancy Garnett

Lisa A. Bryant v. Madison Management Services, LLC, et al.

<p>1 APPEARANCES: 2 For the Plaintiff: GEORGE HAINES, ESQ. 3 Freedom Law Firm 4 8985 South Eastern Avenue 5 Suite 350 6 Las Vegas, Nevada 89123 7 (702) 880-5554 8 9 AND 10 11 MARC E. DANN, ESQ. 12 Dann Law Firm 13 2828 Euclid Avenue 14 Suite 300 15 Cleveland, Ohio 44115 16 (216) 373-0539 17 18 For the Defendant: No appearance. 19 20 Also Present: Scott Beck, Videographer 21 Lisa Bryant 22 23 ***** 24 25</p>	<p>2 4 FRIDAY, JULY 30, 2021; LAS VEGAS, NEVADA 1:36 p.m. -oOo- THE VIDEOGRAPHER: Good afternoon. Today is July 30th, 2021. The time is approximately 1:36 Pacific Standard Time. This is the remote deposition of Nancy Garnett in the case Lisa A. Bryant versus Madison Management Services, LLC, et al. I'm Scott Beck with Oasis Reporting Services. I'll be monitoring the proceedings and recording both video and audio today. At this time I'll ask counsel to identify themselves, state whom they represent, and agree on the record that there is no objection to the court reporter administering a binding oath to the witness through remote videoconferencing. If no objection is stated, we will proceed forward with the agreement of all counsel. We'll begin appearances with the noticing attorneys, please. MR. HAINES: George Haines from Freedom Law Firm on behalf of the plaintiff, Lisa Bryant. MR. DANN: And Marc Dann from Dann Law, also for the plaintiff, Lisa Bryant. THE VIDEOGRAPHER: Thank you. Our court reporter today is Sarah Winn-Boddie with Oasis Reporting Services, and the reporter may now swear in the witness, please.</p>
<p>3 1 2 I N D E X 3 WITNESS PAGE 4 NANCY GARNETT 5 Examination by Mr. Dann 5 6 7 8 9 10 EXHIBITS MARKED 11 A 7/7/21 Letter 25 12 B Deed of Trust 25 13 14 15 16 17 18 19 20 21 22 23 24 25</p>	<p>5 1 Whereupon, 2 NANCY GARNETT, 3 having been first duly sworn to testify to the truth, the 4 whole truth, and nothing but the truth, was examined and 5 testified as follows: 6 MR. DANN: George, if you wouldn't mind putting on 7 the record your -- your conversation with opposing counsel. 8 MR. HAINES: Sure. I just had a conversation just 9 prior to this recording with Nick Porras. He's counsel for 10 the defendant in this case -- for the defendants in this case. 11 He had indicated that he will not be attending this 12 deposition. He is, I believe, about to jump on a train to go 13 somewhere, but we had filed a notice of deposition with the 14 court. I had -- so he received the notice through electronic 15 service. We had also mailed him the notice. I believe I had 16 emailed him the notice of the subpoena as well. 17 In addition, I emailed him the instructions on how 18 to appear at today's deposition yesterday -- or I believe it 19 was yesterday morning, as soon as I received the instructions. 20 He is not appearing at this deposition. 21 MR. DANN: Thank you. 22 EXAMINATION 23 BY MR. DANN: 24 Q. May I call you Nancy or Ms. Garrett [sic]? 25 Mrs. Garrett? What do you prefer?</p>

Nancy Garnett

Lisa A. Bryant v. Madison Management Services, LLC, et al.

<p>6</p> <p>1 A. Nancy's fine.</p> <p>2 Q. Nancy's fine, because I just butchered your last</p> <p>3 name, so I'm sorry --</p> <p>4 A. That's okay. Everybody does the same thing, so it's</p> <p>5 okay.</p> <p>6 Q. Nancy, my name is Marc Dann, and I'm a lawyer. I</p> <p>7 represent Lisa Bryant, who is the plaintiff in this lawsuit.</p> <p>8 Have you ever had your deposition taken before?</p> <p>9 A. Long time ago.</p> <p>10 Q. Okay. How -- how -- like 10 years? 20 --</p> <p>11 A. Oh, years. Probably 20.</p> <p>12 Q. What kind of case were you -- was your deposition</p> <p>13 taken in?</p> <p>14 A. It had to do with tires, faulty tires on a car that</p> <p>15 was sold to us through a car dealership.</p> <p>16 Q. Yes.</p> <p>17 A. Yeah.</p> <p>18 Q. All right. So I'm going to remind you, since it's</p> <p>19 been a while, kind of what the rules are in a deposition.</p> <p>20 A. Mm-hmm.</p> <p>21 Q. I'm going to ask you questions, and you will -- you</p> <p>22 have whatever time you need to respond to those questions. If</p> <p>23 for some reason you don't understand a question that I'm</p> <p>24 asking, then I'm happy to rephrase it, and -- so that -- until</p> <p>25 I get to a question that you can understand and confidently</p>	<p>8</p> <p>1 with the -- it was, I don't know, several pages long, just</p> <p>2 explaining my notary required -- what I'm required to do as a</p> <p>3 notary, and my signing a -- an agreement with the agency that</p> <p>4 dispatches me on the jobs to follow their direction on what to</p> <p>5 do if the client decides not to sign the paperwork.</p> <p>6 Q. Okay. Anything else besides those things?</p> <p>7 A. No.</p> <p>8 Q. Okay. Nancy, what is your -- where are you employed</p> <p>9 now?</p> <p>10 A. I am self-employed. I'm a mobile notary, and I do</p> <p>11 work with people who are signing mortgages, all kinds, reverse</p> <p>12 mortgages, business mortgages, conventional mortgages, jumbo</p> <p>13 loans, all of that. My primary task is the notarization</p> <p>14 process and to show the documents that are being signed so</p> <p>15 that people understand what they're signing.</p> <p>16 Q. Could you venture or could you tell me how many</p> <p>17 documents you've notarized in your career?</p> <p>18 A. Thousands. I started in 2003, and I've been doing</p> <p>19 it -- it's the only job I have. That's what I've been doing</p> <p>20 since 2003.</p> <p>21 Q. And did you have any training to become a notary?</p> <p>22 A. Yes.</p> <p>23 Q. (Indiscernible.)</p> <p>24 (Reporter interjection.)</p> <p>25 ///</p>
<p>7</p> <p>1 answer.</p> <p>2 And is it -- and -- and if you don't -- if you</p> <p>3 answer without asking me to correct the question, is it fair</p> <p>4 for me to understand -- to -- to conclude that you understood</p> <p>5 the question and you're answering the question I'm asking?</p> <p>6 A. Yes.</p> <p>7 Q. Are you under -- on any medication or anything else</p> <p>8 that would impair your memory or -- or ability to testify or</p> <p>9 reason today?</p> <p>10 A. No.</p> <p>11 Q. Okay. Do you suffer from any -- any physical</p> <p>12 conditions that might impact your ability to testify</p> <p>13 truthfully today?</p> <p>14 A. No.</p> <p>15 Q. Okay. You -- are you -- you're here as a result of</p> <p>16 a subpoena; is that correct?</p> <p>17 A. That's correct.</p> <p>18 Q. Did you get a chance to review the subpoena that was</p> <p>19 sent to you?</p> <p>20 A. I did.</p> <p>21 Q. Okay. And I appreciate you appearing.</p> <p>22 What did you do, if anything, to prepare for today's</p> <p>23 deposition.</p> <p>24 A. I just had some emails that Lisa and I had exchanged</p> <p>25 and a letter that I had written her prior to her court date</p>	<p>9</p> <p>1 BY MR. DANN:</p> <p>2 Q. Did you have any training to become a notary? Now</p> <p>3 you may answer.</p> <p>4 A. Oh. Yes. I started my career and got my training</p> <p>5 through the National Notary Association, and every two years</p> <p>6 I'm required to have that same training. Again it doesn't</p> <p>7 change very much, because the process is pretty much the same,</p> <p>8 but I -- let's see. This is my -- one, two -- I think this is</p> <p>9 my third or fourth time renewing as a notary. That's every</p> <p>10 four years, so however that calculates out.</p> <p>11 The -- when I first started the notary, the State of</p> <p>12 Nevada, they still do, actually, had a in- -- in one of the</p> <p>13 big ballrooms at the hotels, they would have all of the</p> <p>14 notaries come and do a training, and then that's supposed</p> <p>15 to -- each time you get your commission renewed, that is</p> <p>16 continuing, so I just renewed my commission like a year and a</p> <p>17 half ago and went through there. It's now online, so I did</p> <p>18 that training plus the Notary Association as well.</p> <p>19 Q. I just want to go back to your preparation. Did you</p> <p>20 email with anybody else in preparation for this? Did you</p> <p>21 share Lisa's emails or your emails to Lisa?</p> <p>22 A. No. No.</p> <p>23 Q. Did you reach out at all to the agency that had</p> <p>24 hired you to notarize Lisa's documents?</p> <p>25 A. I don't even know what that is. That's</p>

Nancy Garnett

Lisa A. Bryant v. Madison Management Services, LLC, et al.

<p>10</p> <p>1 been 16 years ago or 15, however long. It's been a long time.</p> <p>2 2006 is when all this happened, and I just -- the information</p> <p>3 I provided to her through that letter, conversations on the</p> <p>4 phone has not changed. It's always been the same, and that</p> <p>5 is -- I don't know if you want me to go that far now or you</p> <p>6 want to wait and ask me the question --</p> <p>7 Q. Oh, sure --</p> <p>8 A. -- the process.</p> <p>9 Q. That was my next question, so go right ahead.</p> <p>10 A. Okay. So the process is I'm a contracted employee</p> <p>11 with multiple loan signing agencies, and I don't remember and</p> <p>12 I don't have any record of the agency that actually sent me</p> <p>13 out. However, the process is the same across the agencies</p> <p>14 that I do work with when a borrower refuses to sign the</p> <p>15 paperwork, and I even called the agency when she was there</p> <p>16 because she refused to sign. She said the terms were not what</p> <p>17 she wanted, and that's perfectly fine. It's not up to me to</p> <p>18 make that decision. So while I was there, I called the agency</p> <p>19 that dispatched me on that job and asked what they wanted me</p> <p>20 to do with the paperwork that she refused to sign. I already</p> <p>21 knew the answer, but I wanted her to hear it from them, and</p> <p>22 that is to return the paperwork to them unsigned.</p> <p>23 I sent with that a note back saying, Borrower</p> <p>24 refused to sign. They also knew because when I called them, I</p> <p>25 told them that she was refusing to sign, what should I do, and</p>	<p>12</p> <p>1 is the journal? How -- why did she sign it? What's -- what's</p> <p>2 the process there?</p> <p>3 A. Well, we're supposed to take -- through the</p> <p>4 National -- or with the notary commission, the instructions</p> <p>5 are to copy down the information from their license, name,</p> <p>6 address, license number, date of birth, issue date, and</p> <p>7 expiration date, and it's a one-entry line for the journal</p> <p>8 that I have.</p> <p>9 My journal is set up for mortgage documents, because</p> <p>10 they have little checkboxes that show deed of trust,</p> <p>11 compliance agreement, all those things that need to be</p> <p>12 notarized, there's just a checkbox there, and without her</p> <p>13 signing anything, I wouldn't have recorded anything in the</p> <p>14 journal, other than the fact that she gave me her ID.</p> <p>15 Q. And did you check your journal when -- when Lisa</p> <p>16 reached out to you?</p> <p>17 A. Did I check it? Yes. I gave her a copy of the</p> <p>18 page.</p> <p>19 Q. Okay. And what did you find?</p> <p>20 A. There were -- no checkboxes were checked and no</p> <p>21 document names were written down on the entry where her</p> <p>22 signature was.</p> <p>23 Q. Is there any chance that she could have signed</p> <p>24 documents and you notarized them --</p> <p>25 A. No.</p>
<p>11</p> <p>1 that's what they told me to do.</p> <p>2 Q. What -- what is the process that you use -- and I --</p> <p>3 first of all, is the process of notarizing a document the same</p> <p>4 now as it was 16 years ago?</p> <p>5 A. Yes.</p> <p>6 Q. Can you describe for me and walk us through the</p> <p>7 process of notarizing a document, what happens and when?</p> <p>8 A. Okay. What I do, and it is slightly different,</p> <p>9 because of my past experience with people who don't sign in</p> <p>10 the middle -- we've gone all the way through it halfway and</p> <p>11 found out the terms are not what they expected, so what I do</p> <p>12 is I take their ID and I copy it into my journal and I have</p> <p>13 them sign on the space that says "sign." So then I start to</p> <p>14 explain the documents to them one by one, and at that point</p> <p>15 they either go forward based on the information that's in the</p> <p>16 documents so that they know that the terms are what they</p> <p>17 agreed to or they don't. So if they change -- if they don't</p> <p>18 change their mind and decide not to sign and we go forward, I</p> <p>19 notarize them as we go. We didn't get that far in Lisa's case</p> <p>20 because she declined to sign.</p> <p>21 Q. So she never signed anything and you never notarized</p> <p>22 anything; is that correct?</p> <p>23 A. That's correct. The only thing she signed was my</p> <p>24 journal.</p> <p>25 Q. And tell me about the journal. What -- what -- what</p>	<p>13</p> <p>1 Q. -- that -- that weren't -- and there wouldn't -- and</p> <p>2 you might have forgotten to put a check on the checkbox?</p> <p>3 A. No.</p> <p>4 Q. Why -- why --</p> <p>5 A. I wouldn't --</p> <p>6 Q. Why --</p> <p>7 A. Go ahead.</p> <p>8 Q. No, I just want to know why you're so sure about</p> <p>9 that.</p> <p>10 A. Because that's not my process. I only write down</p> <p>11 the documents that I notarize with her in front of me, so we</p> <p>12 didn't even get to the point where we came to a document that</p> <p>13 needed to be notarized. The document -- notarized documents</p> <p>14 are dispersed within the package that we have, and the package</p> <p>15 could exceed 250 pages. Again, I don't know in her case, but</p> <p>16 unless I actually put my stamp and notarized a document with</p> <p>17 her signature on it, it would not go into my journal, and</p> <p>18 that -- that's what I'm required to do by the State and that's</p> <p>19 my process for all these years.</p> <p>20 Q. All right. I'm going to -- oh. The other thing I</p> <p>21 didn't tell you is if you need to take a break at any time,</p> <p>22 you can tell me, as long as --</p> <p>23 A. Okay.</p> <p>24 Q. -- there's not a question pending, and I'm happy to</p> <p>25 accommodate you.</p>

Nancy Garnett

Lisa A. Bryant v. Madison Management Services, LLC, et al.

<p>14</p> <p>1 A. No problem.</p> <p>2 Q. Okay. Let me just -- I'm going to share my screen,</p> <p>3 so if this works, and I'm going to share with you a document.</p> <p>4 Can you see it?</p> <p>5 A. Yes.</p> <p>6 MR. DANN: Okay. And Madam Reporter, this would be</p> <p>7 our Exhibit A to the deposition. We have not marked it as</p> <p>8 such, but I -- we've provided you with a copy, and I would ask</p> <p>9 that you marked it as Exhibit A, if that's acceptable to you.</p> <p>10 BY MR. DANN:</p> <p>11 Q. Okay. So I'm going to ask you some questions about</p> <p>12 this document.</p> <p>13 A. Yes.</p> <p>14 Q. First of all, it's dated June 7th, 2021. Can you</p> <p>15 tell me whether you've seen this document before?</p> <p>16 A. Yes. That's the document that I put together for</p> <p>17 Lisa prior to her court date, the last court date. I don't</p> <p>18 know how many court dates she's had, but this was the most</p> <p>19 recent one.</p> <p>20 Q. So this is an authentic copy of the letter that you</p> <p>21 sent to Lisa?</p> <p>22 A. Yes, it is.</p> <p>23 Q. Okay. And did you indeed send it on June 7th,</p> <p>24 2021?</p> <p>25 A. Yes, I did.</p>	<p>16</p> <p>1 which was on a FedEx or UPS label that was provided to me when</p> <p>2 I printed out the documents.</p> <p>3 Q. Do you remember who the title company is?</p> <p>4 A. I do not.</p> <p>5 Q. Okay. And it was only 16 years ago. I can't</p> <p>6 imagine you can't remember.</p> <p>7 A. Yeah, I know. I'm lucky to remember what I did last</p> <p>8 week.</p> <p>9 Q. Understood.</p> <p>10 Did you have any communication with the originator</p> <p>11 of the loan, and -- first of all, did you have any direct</p> <p>12 communication with the title company other than mailing them</p> <p>13 back the documents?</p> <p>14 A. No. Once the borrower decides not to sign, I know</p> <p>15 from what I've always supposed to do is return them.</p> <p>16 Q. Mm-hmm.</p> <p>17 A. I don't even know what made me call the people in</p> <p>18 front of them, but I think because she was so adamant about</p> <p>19 taking the documents back, that I said -- because I told her,</p> <p>20 I have to return them. That generates an invoice for me as my</p> <p>21 payment to show up, and then it also keeps them in the loop</p> <p>22 that I'm returning them. And so once I left there, the very</p> <p>23 next day, I put the whole package with the note on there</p> <p>24 stating that she had refused to sign and put it into the --</p> <p>25 the return label, either FedEx or UPS, and again, I don't</p>
<p>15</p> <p>1 Q. Okay. And in this letter it indicates that</p> <p>2 somewhere during the process, she decided she did not want the</p> <p>3 loan. Let me try to find that.</p> <p>4 Do you recall writing that to her?</p> <p>5 A. Yes.</p> <p>6 Q. Okay. And is that what actually happened?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. Was there any condition that she had on that</p> <p>9 or any -- any conversation with anybody else other than you --</p> <p>10 and then you put her on the phone with -- with whoever sent</p> <p>11 you there?</p> <p>12 A. No. It was just she and I together. There was</p> <p>13 no -- I don't recall any family members there, any children.</p> <p>14 As far as I remember, it was just she and I.</p> <p>15 Q. And you don't recall which signing agency it was</p> <p>16 that you --</p> <p>17 A. No. I worked for a whole bunch of them, yeah.</p> <p>18 Q. Okay. And did you -- you said that you returned the</p> <p>19 package, then, to the signing agency?</p> <p>20 A. Correct.</p> <p>21 Q. And when you --</p> <p>22 A. They provide me with a FedEx label going back</p> <p>23 directly to the -- actually, to the title company, but the</p> <p>24 signing agency works directly with the title company, and so</p> <p>25 my instruction was to return it back to the title company,</p>	<p>17</p> <p>1 remember, and dropped it into the box or UPS or FedEx</p> <p>2 directly.</p> <p>3 Q. Nancy, are you paid based -- the same if somebody</p> <p>4 signs or if somebody doesn't sign?</p> <p>5 A. No. I get half of what the agreed fee is. Back</p> <p>6 then, the fee was around \$75 for a full signed and executed</p> <p>7 package, so -- every now and then at that time I would get a</p> <p>8 hundred dollars, but I would only get 50 percent of that if</p> <p>9 they chose not to sign, so basically it's a print fee and a</p> <p>10 show-up fee.</p> <p>11 Q. Mm-hmm. And did -- I'm sorry. What's -- and what's</p> <p>12 the fee currently for -- for that -- for that work?</p> <p>13 A. Now they're -- it depends on the type of loan.</p> <p>14 Reverse mortgages are anywhere from a hundred to 150, and then</p> <p>15 the regular loans are 75 to a hundred. Reverse mortgages</p> <p>16 have -- they're like almost 300 pages, and that's why we get</p> <p>17 paid a little bit more, but typically on a -- let's say an</p> <p>18 average of a 150-page document, I would get paid a hundred,</p> <p>19 and that includes the printing fee.</p> <p>20 Q. Do you worry that that would give you or somebody</p> <p>21 else an incentive to try to get documents signed, even if</p> <p>22 somebody like -- like Lisa Bryant said they didn't want to</p> <p>23 sign them, because you had a financial incentive?</p> <p>24 A. No. I would not do that. I'm not -- that's not me.</p> <p>25 That's not who I am. I'm very honest. I built a good</p>

Nancy Garnett

Lisa A. Bryant v. Madison Management Services, LLC, et al.

<p>18</p> <p>1 reputation. I have no reason for anything like that to 2 happen.</p> <p>3 Q. All right. You've never been disciplined as a 4 notary or had any -- any action by the State regarding your 5 work as a notary?</p> <p>6 A. I did once when somebody questioned the number of 7 appointments that I had, and I proved what I had and I was 8 disciplined and that's never happened again.</p> <p>9 Q. What -- what year was that? Do you recall?</p> <p>10 A. Oh, gosh. I would say it's at least ten years ago.</p> <p>11 Q. And what was the nature of the discipline that -- 12 that -- that was decided for you?</p> <p>13 A. That particular one, I had a loan officer that I was 14 working with and she asked me to notarize these and I was late 15 getting there, I didn't get there, so she watched them sign 16 and then I verified their signature against their driver's 17 licenses she gave me a copy of, and so that's something I know 18 that is not -- it's not legal. I apologized for it. It's 19 something I would never do again, and I paid the price for it.</p> <p>20 Q. And since that time, have you ever done anything 21 like that again?</p> <p>22 A. No.</p> <p>23 Q. Okay. And -- all right. Let me show you another 24 document.</p> <p>25 Can you see this one?</p>	<p>20</p> <p>1 A. -- but I don't know how she got that since she 2 declined to sign it.</p> <p>3 Q. When you say "how she got that," who do you mean by 4 "she"?</p> <p>5 A. Lisa. I don't know -- I don't know who provided you 6 that information. I don't know how that happened.</p> <p>7 Q. Okay. But you -- to your recollection, Lisa never 8 signed anything in front of you?</p> <p>9 A. Not to my knowledge.</p> <p>10 Q. Right. And your journal reflects that as well?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. Was the date of the journal that you checked 13 October 26th of 2006?</p> <p>14 A. I sent her a copy of it. Yes, it was. Oh, and 15 the -- on the journal, it shows \$95.</p> <p>16 Q. Okay. Does the journal indicate that this deed of 17 trust was signed --</p> <p>18 A. It does.</p> <p>19 Q. It does?</p> <p>20 A. It does. Yes, it does. I'm sorry. My memory is 21 not so good. I should have looked at this.</p> <p>22 Q. Okay. Okay. So the -- if the deed of trust -- so 23 when you recalled that she didn't sign documents, was it -- 24 was it the deed of trust or something else that she didn't 25 agree to sign?</p>
<p>19</p> <p>1 A. Yes.</p> <p>2 Q. Okay. And at the top it says here "Deed of trust." 3 Do you see that?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. And can you see here --</p> <p>6 MR. DANN: And Madam Reporter, I'd like to have this 7 marked as Exhibit B, and this is the deed of trust.</p> <p>8 BY MR. DANN:</p> <p>9 Q. The name Lisa Bryant, do you see that?</p> <p>10 A. I see it.</p> <p>11 Q. Okay. Have you ever seen this document before?</p> <p>12 A. I can't -- I mean, I -- I see deeds every day, so I 13 couldn't say specifically unless I see my signature at the 14 bottom, and whether that is my signature or not.</p> <p>15 Q. Well, let's take a look at the bottom.</p> <p>16 A. That is my signature.</p> <p>17 Q. Okay.</p> <p>18 A. Go down to the very bottom of that page.</p> <p>19 Q. Mm-hmm.</p> <p>20 A. Back up.</p> <p>21 Q. Back up?</p> <p>22 A. Okay. No, you're good.</p> <p>23 No. I don't know. That's -- that's my writing, 24 that's my signature, I always print my name under it --</p> <p>25 Q. Mm-hmm.</p>	<p>21</p> <p>1 A. You know, I really don't remember. I honestly 2 don't. According to this, and I have to go by what the 3 journal says, we must have gotten at least partway through, 4 because the compliance agreement is checked off, the deed of 5 trust is checked off, and the signature affidavit is checked 6 off.</p> <p>7 Q. All right. Did you -- did you know Lisa Bryant 8 personally?</p> <p>9 A. I did not.</p> <p>10 Q. Okay. How did you identify her?</p> <p>11 A. With her driver's license.</p> <p>12 Q. Had you ever notarized documents that she signed 13 before or after?</p> <p>14 A. Not that I recall.</p> <p>15 Q. Has anybody else other than Lisa and now today me 16 talked to you about this particular signing and this 17 particular deed?</p> <p>18 A. No.</p> <p>19 Q. When you did the signings in 2006, if you can -- can 20 you tell me what the order was of documents that you had 21 signed? Did you go in a certain order?</p> <p>22 A. Typically I go right from the first page to the 23 last, based on the way it was sent to me.</p> <p>24 Q. Okay.</p> <p>25 A. It's usually a PDF format. It could be multiple</p>

Nancy Garnett

Lisa A. Bryant v. Madison Management Services, LLC, et al.

<p>22</p> <p>1 attachments, and so I just put them all together, but usually 2 it's one document that I print out. 3 Q. Like one big, long document, and then you go in 4 order? 5 A. Yeah. 6 Q. Do you know where the deed of trust -- 7 A. Correct. 8 Q. -- usually falls in that order or is it different 9 with each -- with each signing? 10 A. It's different with each signing. 11 Q. Do you -- 12 A. A lot of times the title company has a big stack of 13 documents that I do first, because that's who it goes back to, 14 and then the loan documents start after all of the escrow 15 documents, so it could have been in -- from the first page of 16 the loan documents to where the deed was, it could have been 17 anywhere from, let's say, the 10th page to the 50th page. 18 They're just all in different order, basically. 19 Q. But the -- as you said, the escrow documents, the 20 land title documents get signed first and then -- and then the 21 non-escrow documents afterward? 22 A. Right. And there's no hard-and-fast rule. I could 23 have done the loan documents first and then the escrow 24 documents after, but typically I just always do the escrow 25 documents first and then the loan documents afterwards.</p>	<p>24</p> <p>1 phone, if he could, so we'll go off the record now. 2 THE VIDEOGRAPHER: We're off record at 2:04 p.m. 3 (Recess taken from 2:04 p.m. to 2:07 p.m.) 4 THE VIDEOGRAPHER: We are back on the record, and 5 the time is 2:07 p.m. 6 BY MR. DANN: 7 Q. Nancy, I just have, I believe, one more question. 8 A. Sure. 9 Q. Was anybody else present at the time you and -- and 10 Lisa Bryant were together for this signing? 11 A. Not that I recall. 12 MR. DANN: No further questions. I really 13 appreciate your conscientious participation in this, and you 14 are obviously a good -- a good, honorable citizen, so thank 15 you for participating in this. 16 THE WITNESS: Thank you. I hope it comes through, 17 because I'm very -- I'm a Christian woman, so I don't want to 18 do anything that would make my God angry with me. 19 MR. DANN: Thank you. 20 THE WITNESS: Thank you. 21 MR. DANN: You have the right to read this to make 22 sure the court reporter got it down correctly -- 23 THE WITNESS: Okay. 24 MR. DANN: -- or you can waive that right and she 25 can just go ahead and produce the -- the transcript to me.</p>
<p>23</p> <p>1 Q. And so it's -- is it -- is it reasonable to infer 2 that -- that -- that Lisa Bryant could have signed the deed of 3 trust without having ultimately signed the note? 4 A. Yes, because the note is not notarized, so it 5 wouldn't go into the journal. 6 Q. Right. And you don't have any recollection of 7 whether she signed the note or not, correct? 8 A. I do not. 9 Q. But you do know that the process was interrupted at 10 a certain point? 11 A. Yes. 12 Q. And you know that for certain, correct? 13 A. Yes, I do. Right. 14 Q. All right. Have you ever heard from 15 Waldman & Porras or anybody else about this particular matter? 16 A. No. 17 Q. Anything from a company called PVK? 18 A. No. 19 MR. DANN: I -- let me just take a moment. I'm 20 going to go off -- off screen for a second and see if -- 21 THE WITNESS: Okay. 22 MR. DANN: -- and think about whether I have another 23 question to ask. 24 THE WITNESS: Okay. 25 MR. DANN: And I'd ask George to call me on my cell</p>	<p>25</p> <p>1 THE WITNESS: She can -- yeah. I don't -- I mean, 2 I've given you all that I had. I apologize for not reviewing 3 what I had prior to, and she can go ahead. 4 MR. DANN: Okay. All right. That's it. With that, 5 no further -- I think we're done. Thank you very much. 6 THE WITNESS: Thank you. 7 THE VIDEOGRAPHER: This will conclude the video 8 deposition of Nancy Garnett, and we are off record at 9 2:09 p.m. 10 (Exhibits A and B marked for identification.) 11 (The deposition concluded at 2:09 p.m.) 12 -oOo- 13 14 15 16 17 18 19 20 21 22 23 24 25</p>

Nancy Garnett

Lisa A. Bryant v. Madison Management Services, LLC, et al.

26

1 REPORTER'S CERTIFICATE

2 STATE OF NEVADA)

3) ss:

4 COUNTY OF CLARK)

5 I, Sarah M. Winn-Boddie, a Certified Court Reporter
 6 licensed by the State of Nevada, do hereby certify: That I
 7 reported the videotaped, videoconferenced deposition of NANCY
 8 GARNETT, commencing on Friday, July 30, 2021 at 1:36 p.m.

9 That prior to being deposed, the witness was duly
 10 sworn by me to testify to the truth. That I thereafter
 11 transcribed my said shorthand notes into typewriting and that
 12 the typewritten transcript is a complete, true and accurate
 13 transcription of my said shorthand notes, and that review of
 14 the transcript has been waived.

15 I further certify that I am not a relative, employee
 16 or independent contractor of counsel, of any of the parties,
 17 nor a relative, employee or independent contractor of the
 18 parties involved in said action, nor a person financially
 19 interested in the action, nor do I have any other relationship
 20 with any of the parties or with counsel of any of the parties
 21 involved in the action that may reasonably cause my
 22 impartiality to be questioned.

23 IN WITNESS WHEREOF, I have set my hand in my office
 24 in the County of Clark, State of Nevada, this 7th day of
 25 August, 2021.



Sarah M. Winn-Boddie, RPR, CCR No. 868

Nancy Garnett

Lisa A. Bryant v. Madison Management Services, LLC, et al.

\$	3	agreed 11:17 17:5	10:14,23 16:14
\$75 17:6	300 17:16	agreement 8:3 12:11 21:4	bottom 19:14,15,18
\$95 20:15	5	ahead 10:9 13:7 24:25 25:3	box 17:1
-	50 17:8	angry 24:18	break 13:21
-ooo- 25:12	50th 22:17	answering 7:5	Bryant 6:7 17:22 19:9 21:7 23:2 24:10
1	7	apologize 25:2	built 17:25
10 6:10	75 17:15	apologized 18:18	bunch 15:17
10th 22:17	7th 14:14,23	appearing 5:20 7:21	business 8:12
15 10:1	A	appointments 18:7	butchered 6:2
150 17:14	ability 7:8,12	Association 9:5,18	C
150-page 17:18	acceptable 14:9	attachments 22:1	calculates 9:10
16 10:1 11:4 16:5	accommodate 13:25	attending 5:11	call 5:24 16:17 23:25
2	action 18:4	authentic 14:20	called 10:15,18,24 23:17
20 6:10,11	adamant 16:18	average 17:18	car 6:14,15
2003 8:18,20	addition 5:17	B	career 8:17 9:4
2006 10:2 20:13 21:19	address 12:6	back 9:19 10:23 15:22,25 16:13, 19 17:5 19:20,21 22:13 24:4	case 5:10 6:12 11:19 13:15
2021 14:14,24	affidavit 21:5	ballrooms 9:13	cell 23:25
250 13:15	afterward 22:21	based 11:15 17:3 21:23	chance 7:18 12:23
26th 20:13	agencies 10:11,13	basically 17:9 22:18	change 9:7 11:17,18
2:04 24:2,3	agency 8:3 9:23 10:12,15,18 15:15, 19,24	big 9:13 22:3,12	changed 10:4
2:07 24:3,5	agree 20:25	birth 12:6	check 12:15,17 13:2
2:09 25:9,11		bit 17:17	checkbox 12:12 13:2
		borrower	checkboxes 12:10,20

Nancy Garnett

Lisa A. Bryant v. Madison Management Services, LLC, et al.

checked 12:20 20:12 21:4,5	7:3,16,17 11:22,23 15:20 22:7 23:7,12	14:7 25:8,11	employed 8:8
children 15:13	correctly 24:22	describe 11:6	employee 10:10
chose 17:9	counsel 5:7,9	direct 16:11	entry 12:21
Christian 24:17	court 5:14 7:25 14:17,18 24:22	direction 8:4	escrow 22:14,19,23,24
citizen 24:14	<hr/>	directly 15:23,24 17:2	EXAMINATION 5:22
client 8:5	D <hr/>	discipline 18:11	examined 5:4
commission 9:15,16 12:4	Dann 5:6,21,23 6:6 9:1 14:6,10 19:6,8 23:19,22,25 24:6,12, 19,21,24 25:4	disciplined 18:3,8	exceed 13:15
communication 16:10,12	date 7:25 12:6,7 14:17 20:12	dispatched 10:19	exchanged 7:24
company 15:23,24,25 16:3,12 22:12 23:17	dated 14:14	dispatches 8:4	executed 17:6
compliance 12:11 21:4	dates 14:18	dispersed 13:14	Exhibit 14:7,9 19:7
conclude 7:4 25:7	day 16:23 19:12	document 11:3,7 12:21 13:12,13,16 14:3,12,15,16 17:18 18:24 19:11 22:2,3	exhibits 25:10
concluded 25:11	dealership 6:15	documents 8:14,17 9:24 11:14,16 12:9, 24 13:11,13 16:2,13,19 17:21 20:23 21:12,20 22:13, 14,15,16,19,20,21,23,24,25	expected 11:11
condition 15:8	decide 11:18	dollars 17:8	experience 11:9
conditions 7:12	decided 15:2 18:12	driver's 18:16 21:11	expiration 12:7
confidently 6:25	decides 8:5 16:14	dropped 17:1	explain 11:14
conscientious 24:13	decision 10:18	duly 5:3	explaining 8:2
continuing 9:16	declined 11:20 20:2	<hr/>	F <hr/>
contracted 10:10	deed 12:10 19:2,7 20:16,22,24 21:4,17 22:6,16 23:2	E <hr/>	fact 12:14
conventional 8:12	deeds 19:12	electronic 5:14	fair 7:3
conversation 5:7,8 15:9	defendant 5:10	email 9:20	falls 22:8
conversations 10:3	defendants 5:10	emailed 5:16,17	family 15:13
copy 11:12 12:5,17 14:8,20 18:17 20:14	depends 17:13	emails 7:24 9:21	faulty 6:14
correct	deposition 5:12,13,18,20 6:8,12,19 7:23		Fedex 15:22 16:1,25 17:1

Nancy Garnett

Lisa A. Bryant v. Madison Management Services, LLC, et al.

fee 17:5,6,9,10,12,19 filed 5:13 financial 17:23 find 12:19 15:3 fine 6:1,2 10:17 follow 8:4 forgotten 13:2 format 21:25 forward 11:15,18 found 11:11 fourth 9:9 front 13:11 16:18 20:8 full 17:6 <hr/> G <hr/> Garnett 5:2 25:8 Garrett 5:24,25 gave 12:14,17 18:17 generates 16:20 George 5:6 23:25 give 17:20 God 24:18 good 17:25 19:22 20:21 24:14 gosh 18:10	<hr/> H <hr/> HAINES 5:8 half 9:17 17:5 halfway 11:10 happen 18:2 happened 10:2 15:6 18:8 20:6 happy 6:24 13:24 hard-and-fast 22:22 hear 10:21 heard 23:14 hired 9:24 honest 17:25 honestly 21:1 honorable 24:14 hope 24:16 hotels 9:13 hundred 17:8,14,15,18 <hr/> I <hr/> ID 11:12 12:14 identification 25:10 identify 21:10 imagine 16:6 impact	7:12 impair 7:8 in- 9:12 incentive 17:21,23 includes 17:19 Indiscernible 8:23 infer 23:1 information 10:2 11:15 12:5 20:6 instruction 15:25 instructions 5:17,19 12:4 interjection 8:24 interrupted 23:9 invoice 16:20 issue 12:6 <hr/> J <hr/> job 8:19 10:19 jobs 8:4 journal 11:12,24,25 12:1,7,9,14,15 13:17 20:10,12,15,16 21:3 23:5 jumbo 8:12 jump 5:12 June 14:14,23	<hr/> K <hr/> kind 6:12,19 kinds 8:11 knew 10:21,24 knowledge 20:9 <hr/> L <hr/> label 15:22 16:1,25 land 22:20 late 18:14 lawsuit 6:7 lawyer 6:6 left 16:22 legal 18:18 letter 7:25 10:3 14:20 15:1 license 12:5,6 21:11 licenses 18:17 Lisa 6:7 7:24 9:21 12:15 14:17,21 17:22 19:9 20:5,7 21:7,15 23:2 24:10 Lisa's 9:21,24 11:19 loan 10:11 15:3 16:11 17:13 18:13 22:14,16,23,25 loans 8:13 17:15 long 6:9 8:1 10:1 13:22 22:3
---	---	---	--

Nancy Garnett

Lisa A. Bryant v. Madison Management Services, LLC, et al.

looked 20:21	mortgages 8:11,12 17:14,15		17:8
loop 16:21	multiple 10:11 21:25	O	perfectly 10:17
lot 22:12	N	October 20:13	personally 21:8
lucky 16:7	names 12:21	officer 18:13	phone 10:4 15:10 24:1
M	Nancy 5:2,24 6:6 8:8 17:3 24:7 25:8	one-entry 12:7	physical 7:11
Madam 14:6 19:6	Nancy's 6:1,2	online 9:17	plaintiff 6:7
made 16:17	National 9:5 12:4	opposing 5:7	point 11:14 13:12 23:10
mailed 5:15	nature 18:11	order 21:20,21 22:4,8,18	Porras 5:9 23:15
mailing 16:12	needed 13:13	originator 16:10	prefer 5:25
make 10:18 24:18,21	Nevada 9:12	P	preparation 9:19,20
Marc 6:6	Nick 5:9	p.m. 24:2,3,5 25:9,11	prepare 7:22
marked 14:7,9 19:7 25:10	non-escrow 22:21	package 13:14 15:19 16:23 17:7	present 24:9
matter 23:15	notaries 9:14	pages 8:1 13:15 17:16	pretty 9:7
medication 7:7	notarization 8:13	paid 17:3,17,18 18:19	price 18:19
members 15:13	notarize 9:24 11:19 13:11 18:14	paperwork 8:5 10:15,20,22	primary 8:13
memory 7:8 20:20	notarized 8:17 11:21 12:12,24 13:13,16 21:12 23:4	participating 24:15	print 17:9 19:24 22:2
middle 11:10	notarizing 11:3,7	participation 24:13	printed 16:2
mind 5:6 11:18	notary 8:2,3,10,21 9:2,5,9,11,18 12:4 18:4,5	partway 21:3	printing 17:19
Mm-hmm 6:20 16:16 17:11 19:19,25	note 10:23 16:23 23:3,4,7	past 11:9	prior 5:9 7:25 14:17 25:3
mobile 8:10	notice 5:13,14,15,16	payment 16:21	problem 14:1
moment 23:19	number 12:6 18:6	PDF 21:25	process 8:14 9:7 10:8,10,13 11:2,3,7 12:2 13:10,19 15:2 23:9
morning 5:19		pending 13:24	produce 24:25
mortgage 12:9		people 8:11,15 11:9 16:17	proved 18:7
		percent	

Nancy Garnett

Lisa A. Bryant v. Madison Management Services, LLC, et al.

<p>provide 15:22</p> <p>provided 10:3 14:8 16:1 20:5</p> <p>put 13:2,16 14:16 15:10 16:23, 24 22:1</p> <p>putting 5:6</p> <p>PVK 23:17</p> <hr/> <p style="text-align: center;">Q</p> <hr/> <p>question 6:23,25 7:3,5 10:6,9 13:24 23:23 24:7</p> <p>questioned 18:6</p> <p>questions 6:21,22 14:11 24:12</p> <hr/> <p style="text-align: center;">R</p> <hr/> <p>reach 9:23</p> <p>reached 12:16</p> <p>read 24:21</p> <p>reason 6:23 7:9 18:1</p> <p>reasonable 23:1</p> <p>recall 15:4,13,15 18:9 21:14 24:11</p> <p>recalled 20:23</p> <p>received 5:14,19</p> <p>recent 14:19</p> <p>recess 24:3</p> <p>recollection 20:7 23:6</p> <p>record 5:7 10:12 24:1,2,4 25:8</p>	<p>recorded 12:13</p> <p>recording 5:9</p> <p>reflects 20:10</p> <p>refused 10:16,20,24 16:24</p> <p>refuses 10:14</p> <p>refusing 10:25</p> <p>regular 17:15</p> <p>remember 10:11 15:14 16:3,6,7 17:1 21:1</p> <p>remind 6:18</p> <p>renewed 9:15,16</p> <p>renewing 9:9</p> <p>rephrase 6:24</p> <p>reporter 8:24 14:6 19:6 24:22</p> <p>represent 6:7</p> <p>reputation 18:1</p> <p>required 8:2 9:6 13:18</p> <p>respond 6:22</p> <p>result 7:15</p> <p>return 10:22 15:25 16:15,20,25</p> <p>returned 15:18</p> <p>returning 16:22</p> <p>reverse 8:11 17:14,15</p> <p>review 7:18</p>	<p>reviewing 25:2</p> <p>rule 22:22</p> <p>rules 6:19</p> <hr/> <p style="text-align: center;">S</p> <hr/> <p>screen 14:2 23:20</p> <p>self-employed 8:10</p> <p>send 14:23</p> <p>service 5:15</p> <p>set 12:9</p> <p>share 9:21 14:2,3</p> <p>show 8:14 12:10 16:21 18:23</p> <p>show-up 17:10</p> <p>shows 20:15</p> <p>sic 5:24</p> <p>sign 8:5 10:14,16,20,24,25 11:9, 13,18,20 12:1 16:14,24 17:4, 9,23 18:15 20:2,23,25</p> <p>signature 12:22 13:17 18:16 19:13,14, 16,24 21:5</p> <p>signed 8:14 11:21,23 12:23 17:6,21 20:8,17 21:12,21 22:20 23:2, 3,7</p> <p>signing 8:3,11,15 10:11 12:13 15:15, 19,24 21:16 22:9,10 24:10</p> <p>signings 21:19</p> <p>signs 17:4</p> <p>slightly</p>	<p>11:8</p> <p>sold 6:15</p> <p>space 11:13</p> <p>specifically 19:13</p> <p>stack 22:12</p> <p>stamp 13:16</p> <p>start 11:13 22:14</p> <p>started 8:18 9:4,11</p> <p>State 9:11 13:18 18:4</p> <p>stating 16:24</p> <p>subpoena 5:16 7:16,18</p> <p>suffer 7:11</p> <p>supposed 9:14 12:3 16:15</p> <p>sworn 5:3</p> <hr/> <p style="text-align: center;">T</p> <hr/> <p>taking 16:19</p> <p>talked 21:16</p> <p>task 8:13</p> <p>ten 18:10</p> <p>terms 10:16 11:11,16</p> <p>testified 5:5</p> <p>testify 5:3 7:8,12</p> <p>thing 6:4 11:23 13:20</p>
---	---	--	---

Nancy Garnett

Lisa A. Bryant v. Madison Management Services, LLC, et al.

things 8:6 12:11 Thousands 8:18 time 6:9,22 9:9,15 10:1 13:21 17:7 18:20 24:5,9 times 22:12 tires 6:14 title 15:23,24,25 16:3,12 22:12, 20 today 7:9,13 21:15 today's 5:18 7:22 told 10:25 11:1 16:19 top 19:2 train 5:12 training 8:21 9:2,4,6,14,18 transcript 24:25 trust 12:10 19:2,7 20:17,22,24 21:5 22:6 23:3 truth 5:3,4 truthfully 7:13 type 17:13 typically 17:17 21:22 22:24 <hr/> U <hr/> ultimately 23:3 understand 6:23,25 7:4 8:15 understood 7:4 16:9	unsigned 10:22 UPS 16:1,25 17:1 <hr/> V <hr/> venture 8:16 verified 18:16 video 25:7 <hr/> W <hr/> wait 10:6 waive 24:24 Waldman 23:15 walk 11:6 wanted 10:17,19,21 watched 18:15 week 16:8 woman 24:17 work 8:11 10:14 17:12 18:5 worked 15:17 working 18:14 works 14:3 15:24 worry 17:20 write 13:10 writing 15:4 19:23 written	7:25 12:21 <hr/> Y <hr/> year 9:16 18:9 years 6:10,11 9:5,10 10:1 11:4 13:19 16:5 18:10 yesterday 5:18,19	
--	--	---	--